

1. Plaintiffs filed their Original Complaint on April 26, 2025 (Dkt. 1). Defense counsel sent executed Waiver of Service for each Defendant to Plaintiffs' Counsel on May 12, 2025. Accordingly, Defendants' deadline to file their responsive pleadings is currently on or before Tuesday, July 1, 2025.

## II. Request for Leave

2. Defendants request leave from this Court for a 2-week extension of time to submit their responsive pleadings would extend their deadline to **Tuesday, July 15, 2025**. Counsel believes that extra time is needed due to the complexity of the case at bar and to properly brief and address the claims raised by Plaintiffs' counsel in their Complaint. Counsel believes that extra time is needed due in part to other pressing legal matters but also due to the complexity of the case at bar, to properly brief and address arguments raised by Plaintiffs' counsel. The Defense does not seek this extension for the purposes of delay, but so that justice may be done.

3. The undersigned has conferenced with Plaintiffs' counsel regarding this motion. Counsel for Plaintiff is unopposed to the requested extension.

## **PRAYER FOR RELIEF**

WHEREFORE, PREMISES CONSIDERED, the Defendants, City of Lakeway, Texas, Sergeant Scott Sieber, Lieutenant Tim Stake, Officer Cody Pilgrim, and Officer Wendy Lopez, respectfully requests that this Court grant this opposed motion and allow Defendants to file their responsive pleadings on or before **July 15, 2025**, and for all other relief to which they may be entitled in law or in equity.

Respectfully submitted,

**WRIGHT & GREENHILL, P.C.**  
4700 Mueller Blvd., Suite 200  
Austin, Texas 78723  
(512) 476-4600  
(512) 476-5382 – Fax

By:           /s/ Blair J. Leake            
Blair J. Leake  
State Bar No. 24081630  
[bleake@w-g.com](mailto:bleake@w-g.com)  
Stephen B. Barron  
State Bar No. 24109619

[sbarron@w-g.com](mailto:sbarron@w-g.com)

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

On June 21, 2025, the undersigned conferred with Plaintiffs' counsel regarding the requested extension. Plaintiffs' counsel is unopposed to Defendants' Motion.

\_\_\_\_\_/s/ Blair J. Leake  
Blair J. Leake

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of June, 2025, a true and correct copy of the foregoing document was caused to be served upon all counsel of record via E-File/E-Service/E-Mail, in accordance with the Federal Rules of Civil Procedure.

\_\_\_\_\_/s/ Blair J. Leake  
Blair J. Leake